

PL Sum. J.

Ex. 65

COUNTY OF FULTON
STATE OF GEORGIA

Personally appeared before the undersigned officer duly appointed to administer oaths came Vanessa Cole, who upon first being duly sworn, deposes and states as follows:

1. My name is Vanessa Cole. I am more than twenty-one years of age, competent to testify, have no legal or mental disability and have personal knowledge of the facts stated herein. I freely give this affidavit for use in this case.
2. I was employed by Red Roof Inns, Inc. from September 2009 to January 2016.
3. I was a “floating” general manager, meaning that I rotated to different hotels as the general manager when there was a problem or when the hotels were not performing. I would become the general manager of the problem hotels to improve their performance.
4. I worked at the Red Roof Inn at 2200 Corporate Plaza, Smyrna, Georgia, 30080 (“Smyrna Red Roof Inn”) as the general manager from 2011 to December, 2012.
5. Red Roof Inn, Inc. owned, operated, and managed the Smyrna Red Roof Inn when I was the general manager there.
6. As the general manager at the Red Roof Inn, I oversaw the day-to-day operations of the hotel.
7. Smyrna Red Roof Inn had video cameras on the property and live monitors in the office.
8. While I was the general manager, Red Roof Inns, Inc., as per company policy, closely monitored the online reviews for the Smyrna Red Roof Inn. Online review scores were a metric that was measured by Red Roof Inns, Inc. in reviewing a hotel’s performance, as well as the revenue per available room.
9. I regularly spoke to Jay Moyer, Vice President of Operations for Red Roof Inns, Inc. in charge of the Smyrna Red Roof Inn, about particular online reviews of the hotel and about the hotel’s revenue performance.
10. Mr. Moyer as well as other corporate staff came to the Smyrna Red Roof Inn and spent the night at the hotel for a few days several times a year to inspect the hotel.
11. At the Smyrna Red Roof Inn, the previous general manager, Jimmy Gordon, had a reputation for “ghosting,” not actually working regularly at the hotel despite his job as general manager.
12. Jimmy Gordon also had a reputation for turning a blind eye to criminal activity



occurring at the hotel.

13. When I became the general manager of the Smyrna Red Roof Inn, I tried to improve the hotel's safety and online reviews by calling the police more frequently and by refusing to rent rooms to people I believed were engaged in suspicious or illegal activity.
14. When these actions affected the hotel's revenue per available room, I would often receive a call or visit from Mr. Moyer to discuss the hotel's performance.
15. When I informed Mr. Moyer that the revenue for the hotel had declined because I was trying to clean up the hotel, Mr. Moyer would respond by saying things like, "you need to sell rooms," "be alert but sell," and "you need to get your numbers up."
16. Mr. Moyer often made it clear that I should not make such strong efforts to rid the Smyrna Red Roof Inn of crime if those efforts would result in any decrease in revenue. Red Roof Inns, Inc. prioritized revenue over safety and removing criminal elements from their hotels, including the Smyrna Red Roof Inn.
17. As per corporate policy, when the police were called or when there was a safety or security incident, I filled out incident reports and sent them to Red Roof Inns, Inc.
18. While I was the general manager, the Smyrna Red Roof Inn had an outside security company that provided a security guard. When I came to check on the property, I found the security guard hanging out with guests who were partying outside their rooms, which is what the security guard was supposed to stop. The security guard told me the previous manager of the Smyrna Red Roof Inn often encouraged this type of behavior.
19. While I was working at the Smyrna Red Roof Inn, undercover Cobb County Police informed me that Jimmy Gordon and an employee named Barry were paid by pimps to be lookouts while the pimps trafficked women at the Smyrna Red Roof Inn.
20. I later determined Barry was renting rooms at night without entering them in the reservation system and not accounting for the money.
21. I fired Barry after money was short or unaccounted for, which was approximately six months after speaking to the Cobb County Police about him.

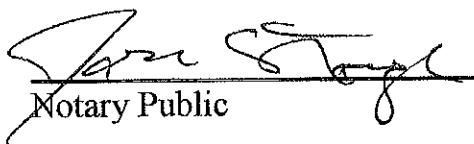
This the 23 day of August, 2019.



Vanessa Cole

I, Jonathan Tonge, a notary public for the county and state, certify that Vanessa Cole, whose name is signed to the foregoing affidavit and who acknowledged before me on this day that, having read the contents of the foregoing Affidavit, he executed the same voluntarily.

Sworn to and subscribed before
me this 23 day of August, 2019



Notary Public

